Information Services Risk Assessment at UMBC: A Case Study

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A Little About Me...

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Goals

- Outline core Information Services Risk Assessment (ISRA) requirements & processes
- Fit ISRAs into the context of the larger organization
- Scale ISRAs to meet time & personnel constraints, security requirements, and organizational standards

Topics

- Theory
 - Definitions
 - Basic ISRA Processes
- Developing Our Process: OIT's Odyssey
 - Scaling the Endeavor
- Case Study: Assessing UMBC's Financial Aid Department
- Online Resources

Theory

Guidelines for Definitions

- Crucial to be clear and precise when defining terms
 - Importance of internal consistency
 - Local jargon phrases may have wholly different meanings elsewhere
- Misunderstandings can cost hours of time and incalculable goodwill

Risk Management vs. Risk Assessment

- Risk Management:
 - Overarching discipline, includes RA
 - Whole service department dedicated to RM
- Risk Assessment:
 - Much more proscribed endeavor
 - Deals with specific departments
 - Deals with specific risks

What is Risk?

Threats that are likely to:

- manifest
- allow access to a vulnerable asset
- cause damage

and sometimes:

have mitigating safeguards

What is Risk? (2)

- Iteration 1:
 - Threat₁ = Likelihood × Vulnerability
 - Risk₁ = Threat₁ × Impact
- ◆ Iteration 2:
 - Threat₂ = (Likelihood × Vulnerability) Mitigations
 - Risk₂ = Threat₂ × Impact

Components of Risk

- ◆ Threat
 - Events that have the potential to compromise information assets, composed of Likelihood, Vulnerability, and Mitigations
- ◆ Impact
 - Severity of consequences in the event of asset compromise

Components of Threat

- Likelihood
 - Probability of event occurring
- Vulnerability
 - Capability (possibly mitigated) of threatening vector to access protected asset
- Mitigations
 - Factors which reduce threat to protected asset (usually partially rather than totally)

More Definitions

- ◆ Asset
 - Potentially vulnerable information which must be protected from threats
- Acceptance of Risk
 - Decision that further mitigations are not justified by predicted impact

Sources of Risk

- Physical: Environmental conditions
- Network: Traffic flow impediments, network application abuse
- System: Physical storage components of information flow
- ◆ People: Users, administrators, intruders

From Theory to Fact-Finding

- Going from general theory of risk to finding concrete ways of isolating, evaluating, and addressing risk locally
- Many different choices
 - Qualitative vs. quantitative
 - One-time vs. short-term progressive vs. longitudinal

Basic ISRA Processes

- Focusing scope
- Gathering information
- Determining Critical Assets
- Assessing Threats
- Proposing Mitigations
- Communicating results

Developing Our Process:

OIT's Odyssey

Federal Regulations

- Legislatively-mandated deadlines for regulatory compliance
 - Gramm-Leach Bliley Act (GLBA)
 - Covers financial institution customer information
 - Compliance by May 23, 2003
 - Health Insurance Portability & Accountability Act (HIPAA)
 - Covers health care provider customer information
 - Compliance by April 21, 2005

Deadlines, Deadlines

We were considering formal risk assessments for the first time in early 2003...

... and it turned out we had an implementation deadline of May 23rd, 2003!

Constraints & Challenges

- Short time to delivery
- Small number of staff (1) working on project
- Highly ambiguous requirements
 - No guidelines or checklists in regulations
 - Greater overhead associated with developing assessment system
- Need for standardization
 - ISRAs had to have same format & consistent approach across areas assessed

Trade-Offs

- ◆ Development Time ⇔⇒ Execution Time
 - More Development Time ⇒ More Standardization
 - More Standardization ⇒ More Consistent Results
- ◆ Overall Time < ⇒ Assessment Depth</p>
 - More Depth ⇒ More Accuracy (hopefully)

An Iterative Approach

- 1. Define specific end goals & conditions
 - Format of final process
 - Time to complete one-time assessment
 - Acceptable levels of complexity
- 2. Research
 - Similar organizations' processes
 - Security and auditing group recommendations
- 3. Create broad preliminary composite
 - Highlight possible directions for management

An Iterative Approach (2)

- 4. Management and developers form consensus on direction & what can be removed
- Cut out all excess material discovered in Step #4 and simplify
- Refine existing material and develop new material as necessary
- 7. Repeat from Step #4 until end conditions from Step #1 are met

OIT's Current Process:

The Condensed Five-Phase Quantified ISRA Methodology

The Five Phases

- Define critical asset at risk / to be protected
- 2. Develop local information flow model
 - A. Identify data storage points
 - B. Identify data transmissions
 - C. Identify discrete steps in flow

The Five Phases (2)

- 3. Identify & evaluate risks associated with local information flows
 - A. Identify risk(s) associated with each step of the flow model from Step 2
 - B. Evaluate identified risk(s): Simplified Risk Quantification Methodology (SRQM) Iteration 1
 - C. Generate a risk-levels matrix
 - D. Determine acceptable risk-levels

The Five Phases (3)

- 4. Develop mitigation strategy to address non-zero risk matrix elements
- 5. Generate Final Risk Levels Matrix and Mitigations & Findings Reports
 - A. Re-evaluate remaining risk(s): SRQM Iteration 2
 - B. Generate final risk-levels matrix
 - C. Generate mitigations & formal findings report

Case Study:

Assessing UMBC's Financial Aid Department

Implementation

- Outlined scope of project
- Met with Financial Aid to acquire background information to facilitate following the Five Phases
- Moved on to Five Phases

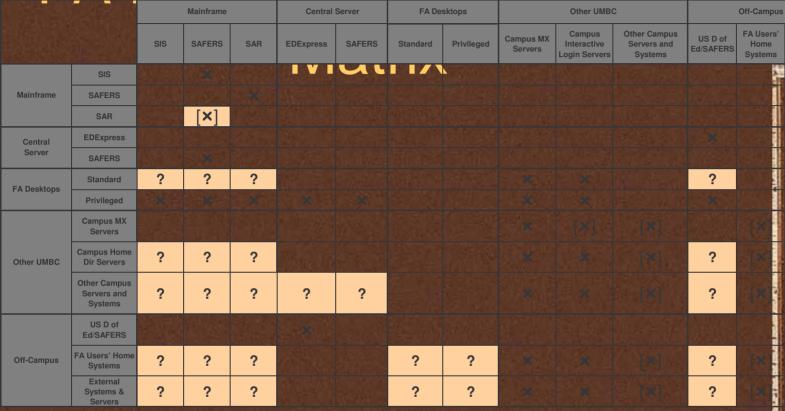
Implementation: Phase 1

- 1. Define critical asset(s)
 - Derived from GLBA requirements
 - Met with Financial Aid
 - Assessed outstanding information
 - Identified instances of GLBA-defined assets
 - Included students' identifying information, financial records, etc.
 - List of assets defined

Implementation: Phase 2

- 2. Develop local information flow model
 - A. Identify data storage points
 - In FA: mainframes, servers, desktops
 - At UMBC: campus servers & systems
 - Off-campus: Gov't servers, home computers
 - B. Identify data transmissions
 - C. Identify discrete steps in flow
 - Local information flow model developed (see next slide)

FA Entity Communication



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External

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Implementation: Phase 3

- 3. Identify & evaluate risks associated with local information flows
 - Greatest risk determined to be unauthorized disclosure of records
 - Identified independently by GLBA and FA
 - A. Evaluate identified risk(s)
 - Vectors include: Windows 98, local storage of assets, poor email authentication
 - B. Generate a risk-levels matrix
 - This step was added as a result of testing the Five Phases during the FA assessment
 - ✓ Acceptable risk levels determined

Implementation: Phase 4

- 4. Develop mitigation strategy to address non-zero risk matrix elements
 - Existing policies mitigate network-borne attacks
 - Additional mitigations proposed to FA
 - Operating system upgrade
 - Alternatives to email for file transmission
 - Employ strong encryption (VPN, PGP, etc.)
 - Mitigation strategy developed

Implementation: Phase 5A/B

- 5. Generate Final Risk Levels Matrix and Mitigations & Findings Reports
 - A. Re-evaluate remaining risk(s)
 - B. Generate final risk-levels matrix

 These two steps were added as a result of testing the Five Phases during the FA assessment

Implementation: Phase 5C

- C. Generate mitigations & formal findings report
 - Executive report
 - Recommendations presented in broad terms
 - Presented to FA liaison
 - Technical report
 - Recommendations presented in more detailed terms
 - Presented to FA for their technical staff
 - Used by OIT to plan and deploy needed upgrades
- Final report complete

Online Resources

UMBC Information Services
 Risk Assessment Reference Site

http://www.umbc.edu/oit/security/risk-assessment/

This Presentation

http://userpages.umbc.edu/~robin/presentations.html